

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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|---------------------------------|---|----------------|
| COMMONWEALTH OF PENNSYLVANIA | : | |
| DEPARTMENT OF ENVIRONMENTAL | : | |
| PROTECTION, | : | |
| | : | |
| Plaintiff | : | |
| v. | : | No. 02-CV-2888 |
| | : | |
| CONCEPT SCIENCES, INC., ET. AL. | : | |
| | : | |
| Defendant | : | |

***ANSWER OF LEHIGH REALTY ASSOCIATES III, JAMES H. REDINGTON,
JOHN ADAMS AND ESTATE OF JACOB QUICK C/O JUDITH QUICK
TO CO-DEFENDANTS' CROSS-CLAIMS***

Defendants, Lehigh Realty Associates III, James H. Redington, John Adams and Estate of Jacob Quick c/o Judith Quick (collectively, "Lehigh Realty Defendants"), through their attorneys, Deasey, Mahoney & Bender, Ltd., for their answer to the cross-claims of co-defendants Concept Sciences, Inc., Irl E. Ward, Jr. and Brian D. Heath, aver as follows:

1. The Lehigh Realty Defendants incorporate by reference their answers to paragraphs 1 through 120 of the complaint, as if such answers were set forth at length herein. To the extent a response to this paragraph is required, the allegations contained therein are denied.

2. This paragraph contains no allegations of fact to which any response is required. To the extent a response is deemed required, the Lehigh Realty Defendants incorporate by reference their answers to paragraphs 1 through 120 of the complaint as if such answers were set forth at length herein, as well as their affirmative defenses and cross-claims against co-defendants.

3. The allegations set forth in this paragraph set forth one or more conclusions of law